

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

MICHELLE STATHAM, )  
                        )  
                        )  
*Plaintiff,*       )  
v.                     )  
                        )  
PALISADES COLLECTION, LLC, )       CASE NO. 4:10-CV-212  
                        )  
                        )  
*Defendant.*       )  
                        )  
\_\_\_\_\_

**NOTICE OF REMOVAL**

Pursuant to 28 U.S.C §§ 1331, 1441, and 1446, Defendant Palisades Collection, LLC (“Palisades”) hereby removes the above-captioned civil action from the 352nd District Court of Tarrant County, Texas, to the United States District Court for the Northern District of Texas. The removal of this case is proper because:

1.     Palisades is the only defendant in the civil action filed by Plaintiff Michelle Statham in the 352nd District Court, Tarrant County, Texas, captioned as *Michelle Statham v. Palisades Collection, LLC*, Cause No. 352-243811-10 (hereinafter, the “State Court Action”).
2.     Defendant removes this case on the basis of the Fair Debt Collection Practices Act, Title 15 U.S.C. § 1692, *et seq.* (“FDCPA”), as the Plaintiff’s Complaint claims relief based on abusive practices in violation of federal law.
3.     Attached hereto as **Exhibit “A”** and incorporated by reference as part of the Notice of Removal are true and correct copies of the process and pleadings in the State Court Action. No further proceedings have taken place in the State Court Action.

4. Pursuant to 28 U.S.C. § 1446(b), Palisades has timely filed this Notice of Removal. Plaintiff's Complaint was served on Palisades on March 3, 2010. This Notice of Removal is filed within thirty (30) days of receipt of the Complaint by Palisades and is, therefore, timely filed under 28 U.S.C. § 1446(b).

5. A copy of this Notice of Removal is being served upon Plaintiff and filed concurrently with the Clerk of the 352nd District Court, Tarrant County, Texas.

WHEREFORE, Defendant Palisades Collection, LLC hereby removes to this Court the State Court Action.

Respectfully submitted,

/s/ Jessica A. Henson  
David R. Clouston  
State Bar No. 00787253  
Christopher R. Richie  
State Bar No. 24002839  
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Attorney for Defendant  
Palisades Collection, LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on this 1st day of April 2010, a copy of the foregoing was served on the following via U.S. Mail, postage prepaid.

Susan A. Landgraf  
Weisberg and Meyers, LLC  
108 E. 46<sup>th</sup> Street  
Austin, TX 78751

/s/ Jessica Henson  
Jessica Henson

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